

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

HIDDEN HILLS MANAGEMENT, LLC,
and 334TH PLACE 2001, LLC,

Plaintiffs,

v.

AMTAX HOLDINGS 114, LLC, and
AMTAX HOLDINGS 169, LLC,

Defendants.

AMTAX HOLDINGS 114, LLC, AMTAX
HOLDINGS 169, LLC, and PARKWAY
APARTMENTS, LP

Counter-Plaintiffs,

v.

HIDDEN HILLS MANAGEMENT, LLC,
and 334TH PLACE 2001, LLC,

Counter-Defendants.

Case No. 3:17-cv-06048-RBL

DECLARATION OF J. SCOTT
PRITCHARD IN SUPPORT OF 334TH
PLACE 2001, LLC'S MOTION TO
COMPEL AND FOR IN CAMERA
REVIEW OF CERTAIN DOCUMENTS

NOTE ON MOTION CALENDAR:
December 7, 2018

I, J. Scott Pritchard, declare as follows:

1. I am one of the attorneys for Plaintiffs Hidden Hills Management, LLC ("**HHM**")
and 334th Place 2001, LLC ("**334th Place**") in the above-titled action, and I make this

DECLARATION OF J. SCOTT PRITCHARD - 1
(No. 3:17-cv-06048-RBL)

STOEL RIVES LLP
ATTORNEYS
600 University Street, Suite 3600, Seattle, WA 98101
Telephone 206.624.0900

1 declaration in support of 334th Place's Motion to Compel and for In Camera Review of Certain
2 Documents.

3 2. Attached hereto as **Exhibit A** is a true and correct copy of a letter from AMTAX
4 Holdings 169 LLC ("**Amtax 169**") to 334th Place dated March 6, 2018.

5 3. Attached hereto as **Exhibit B** is a true and correct copy of an excerpt from the
6 Limited Partnership Agreement for the Parkway Apartments, LP.

7 4. Attached hereto as **Exhibit C** is a true and correct copy of a letter from Amtax
8 169 to 334th Place dated May 8, 2018.

9 5. Attached hereto as **Exhibit D** is a true and correct copy of highlighted excerpts
10 from the transcript of the Rule 30(b)(6) deposition of Chris Blake, the designated representative
11 of Amtax 169, which was held on October 26, 2018. After review of this transcript, I counted
12 the number of objections by Amtax 169's counsel on privilege grounds and/or instructions not to
13 answer and determined there were a total of 51 such instances during the deposition.

14 6. Attached hereto as **Exhibit E** is a true and correct copy of 334th Place's Rule
15 30(b)(6) notice of Amtax 169.

16 7. Attached hereto as **Exhibit F** is a true and correct copy of a letter from Amtax
17 169's counsel to me, dated September 25, 2018.

18 8. Attached hereto as **Exhibit G** is a true and correct copy of a letter from me to
19 Amtax 169's counsel dated October 30, 2018.

20 9. Attached hereto as **Exhibit H** is a true and correct copy of a letter from Amtax
21 169's counsel to me, dated November 2, 2018. The two emails referenced in this letter that
22 Amtax 169 has clawed back, documents bearing Bates Numbers AMTAXHH00019120-21 and
23 AMTAXHH00020525-26, have been submitted separately to the Court for in camera inspection
24 and have not been filed with this motion. These emails have also been sequestered pending
25 resolution of this issue by the Court.

26
DECLARATION OF J. SCOTT PRITCHARD - 2
(No. 3:17-cv-06048-RBL)

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of November, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following participants:

- **David J. Burman**
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- **J. Scott Pritchard**
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Dated November 16, 2018.

s/ Eileen McCarty
Eileen McCarty, Practice Assistant
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